

AMY JOSEPH PEDERSEN, OSB No. 853958
amy.joseph.pedersen@stoel.com
KENNON SCOTT, OSB No. 144280
kennon.scott@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 300
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480

Daniel Prince, Cal. SB# 237112 (*pro hac vice*)
danielprince@paulhastings.com
Zach P. Hutton, Cal. SB#234737 (*pro hac vice*)
zachhutton@paulhastings.com
Felicia A. Davis, Cal. SB# 266523 (*pro hac vice*)
feliciadavis@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, 25th Floor
Los Angeles, CA 90071
Tel: (213) 683-6000
Fax: (213) 627-0705

Attorneys for Defendant NIKE, INC.
[Additional counsel of record listed on signature page]

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, SARA JOHNSTON,
LINDSAY ELIZABETH, and HEATHER
HENDER, individually and on behalf of
others similarly situated,

Plaintiffs,

v.

NIKE, INC., an Oregon Corporation,

Defendant.

Case No.: 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND
[PROPOSED] ORDER REGARDING
REVISED LITIGATION DEADLINES**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel, hereby present the following stipulated and agreed-upon revised litigation deadlines and request that the Court enter an order regarding the same. The Parties have a good faith basis for submitting this request, which extends the remaining litigation deadlines by three weeks to account for the date Plaintiffs submitted to Nike a corrected report for one of their experts and several related corrected backup data files. This request is not brought for purposes of delay and will not result in any prejudice to the Parties or to the Court.

STIPULATED REVISED LITIGATION DEADLINES

The Parties hereby stipulate and agree and request the Court order the following revised litigation deadlines (the prior dates are provided in the first column for ease of reference):

Litigation Deadline	Previous Deadline	Proposed New Deadline
Nike to conduct expert discovery	7/16/21-9/9/21	8/6/21-9/30/21
Nike’s Expert Reports Due	9/10/21	10/1/21
Plaintiffs to conduct expert discovery	9/11/21-11/4/21	10/2/21-11/25/21
Plaintiffs’ Expert Reply Reports Due	11/5/21	11/29/21
Motion for Class Certification	12/17/21	1/10/22
Opposition to Class Certification	3/4/22	3/25/22
Reply to Class Certification	4/18/22	5/9/22

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD

Dated: August 9, 2021

/s/ James Kan

Laura L. Ho (admitted pro hac vice)
lho@gbdhlegal.com
Barry Goldstein, Of Counsel (admitted pro hac vice)
bgoldstein@gbdhlegal.com
James Kan (admitted pro hac vice)
jkan@gbdhlegal.com
Byron Goldstein (admitted pro hac vice)

brgoldstein@gbdhlegal.com
Katharine L. Fisher (admitted pro hac vice)
kfisher@gbdhlegal.com
Mengfei Sun (admitted *pro hac vice*)
msun@gbdhlegal.com
GOLDSTEIN, BORGEN, DARDARIAN & HO
155 Grand Avenue, Suite 900
Oakland, CA 94612
Telephone: (510) 763-9800 | Fax: (510) 835-1417

Laura Salerno Owens, OSB #076230
LauraSalerno@MarkowitzHerbold.com
David B. Markowitz, OSB #742046
DavidMarkowitz@MarkowitzHerbold.com
Harry B. Wilson, OSB #077214
HarryWilson@MarkowitzHerbold.com
Anna M. Joyce, OSB #013112
AnnaJoyce@MarkowitzHerbold.com
Chad A. Naso, OSB #150310
ChadNaso@MarkowitzHerbold.com
Kathryn P. Roberts OSB #064854
KathrynRoberts@MarkowitzHerbold.com
MARKOWITZ HERBOLD PC
1455 SW Broadway, Suite 1900
Portland, OR 97201
Telephone: (503) 295-3085
Fax: (503) 323-9105

Craig Ackerman (admitted *pro hac vice*)
cja@ackermanntilajef.com
Brian W. Denlinger (admitted *pro hac vice*)
bd@ackermanntilajef.com
ACKERMANN & TILAJEF PC
1180 S Beverly Drive, Suite 610
Los Angeles, CA 90035
Tel: (310) 277-0614
Fax: (310) 277-0635

India Lin Bodien (admitted *pro hac vice*)
india@indialinbodienlaw.com
INDIA LIN BODIEN LAW
2522 North Proctor Street, #387
Tacoma, WA 98406-5338
Tel: (253) 503-1672
Fax: (253) 276-0081

Attorneys for Plaintiffs, Opt-In Plaintiffs, and the Putative Class

Dated: August 9, 2021

/s/ Felicia A. Davis

Daniel Prince (*pro hac vice*)
danielprince@paulhastings.com
Zach P. Hutton (*pro hac vice*)
zachhutton@paulhastings.com
Felicia A. Davis (*pro hac vice*)
feliciadavis@paulhastings.com
PAUL HASTINGS LLP
515 South Flower Street, Twenty-Fifth Floor
Los Angeles, CA 90071-2228
Tel: (213) 683-6000
Fax: (213) 627-0705

Amy Joseph Pedersen, OSB No. 853958
amy.joseph.pedersen@stoel.com
Kennon Scott, OSB No. 144280
kennon.scott@stoel.com
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205
Tel: (503) 224-3380
Fax: (503) 220-2480
Attorneys for Defendant Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: August 9, 2021

Respectfully submitted,

PAUL HASTINGS LLP

/s/ *Felicia A. Davis*

Felicia A. Davis (*pro hac vice*)

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation Regarding Revised Litigation Deadlines and hereby enters the same as reflected below.

Litigation Deadline	Revised Date
Nike to conduct expert discovery	8/6/21-9/30/21
Nike's Expert Reports Due	10/1/21
Plaintiffs to conduct expert discovery	10/2/21-11/25/21
Plaintiffs' Expert Reply Reports Due	11/29/21
Motion for Class Certification	1/10/22
Opposition to Class Certification	3/25/22
Reply to Class Certification	5/9/22

IT IS SO ORDERED.

Dated:

HON. JOLIE A. RUSSO
United States Magistrate Judge